

July 17, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Communication in WC Docket Nos. 09-197 and 11-42

Dear Ms. Dortch:

On July 17, 2014, the undersigned counsel for Prepaid Wireless Retail, LLC, d/b/a Odin Mobile, met with Rebekah Goodheart, legal advisor to Commissioner Mignon Clyburn, to discuss Odin Mobile's desire to participate in the Lifeline program.

Odin Mobile explained that people who are blind or visually impaired cannot fully benefit from the Lifeline program and that approval of Odin Mobile's compliance plan would allow individuals who are blind or visually impaired to do so. The discussion was based on the attached presentation.

Respectfully,

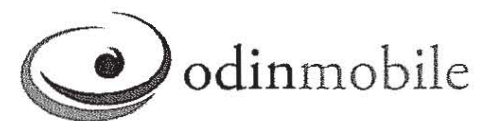
Robert Felgar
General Counsel and General
Manager of Odin Mobile



Presentation by Robert Felgar
July 17, 2014

Cell Phone Use

- Based on a survey of members of the Blinded Veterans Association, the following information was obtained:
 - 42% of BVA members do not use a cell phone at all (compared to 12% for the general population).



Economic Reality

- The causes of low adoption rates include cost and lack of accessibility.
 - As of 2010, approximately 56% of persons ages 16-64, who reported serious difficulty seeing, were not in the labor force.
 - As of 2011, median household income for persons ages 21-64, with a visual disability, was just \$33,200 per year. For population as a whole it was \$50,502.
 - People who are blind tend to not just be poor, but chronically poor.



Lifeline

- Approximately 3 million legally blind Americans are shut out of the program.
 - Phones offered by existing ETCs are not accessible. In fact, very few feature phones in the U.S. offer any level of accessibility.
 - ODIN VI is 100 percent accessible. Emporia essence offers some level of accessibility.
 - We provide accessible user guides.
 - We provide training.



Lifeline

- Prior to 1997, a number of state Lifeline programs supported low income individuals who were also seniors or disabled. In other words, seniors and disabled Americans were prioritized.
- Today, millions of disabled Americans are shut out.

Lifeline

- Approving our compliance plan and ETC petition would give chronically poor disabled Americans, access to Lifeline.
- It would also benefit state equipment distribution programs.



BLINDED VETERANS ASSOCIATION

477 H STREET NORTHWEST • WASHINGTON DC 20001-2694 • (202) 371-8880

December 5, 2012

Dear Sir or Madam:

On behalf of the membership of the Blinded Veterans Association (BVA), the only congressionally chartered veterans service organization exclusively dedicated to serving the needs of our Nation's blinded veterans and their families for 68 years, the BVA would like to lend its strong support for the petition of Odin Wireless to be designated an eligible telecommunications carrier ("ETC").

The BVA is very concerned that many of its members are not benefiting from even the most basic advances in telecommunications technologies. BVA was a strong advocate for both the American Disabilities Act ("ADA"), and provided witnesses in favor of the enactment of the 21st Century Communications and Video Accessibility Act. The BVA views helping its members gain access to wireless and other communications technologies as a critical issue for blinded veterans.

A recent survey suggests that more than one third of the BVA's members do not even use a basic cell phone, let alone a so-called smart phone. Reasons for this vary but include the cost of wireless services, as well as the lack of accessible handsets. While the general population embraced the benefits of wireless technologies years ago, our blinded veterans, who have given so much to our country, are falling behind.

Blinded veterans face huge economic challenges. The Department of Veterans Affairs found that in 2009, 32 percent of blinded veterans lived on less than \$20,000 per year. And according to Disability Statistics, in 2008, only approximately 43.3 percent (plus or minus 0.76 percentage points) of non-institutionalized persons with a visual disability, ages 21-64, were employed. Accordingly, BVA's members would benefit substantially from Lifeline service which would make basic wireless service more affordable. Yet our recent survey suggests that only a small percentage of blinded veterans are taking advantage of the program. This low participation rate is likely caused in significant part by the fact that wireless ETCs do not offer accessible handsets, accessible websites and specially trained customer service that can assist blind customers use their phone. Odin Wireless has stated that it will address these limitations and make its service fully accessible.

The BVA supports the Odin Wireless petition because designating it an ETC will provide low income blinded veterans the ability to participate in a government program that has been largely inaccessible. Our sincere hope is that a wireless Lifeline service that targets the needs of the blind will have significant positive impact on the percentage of BVA's members who adopt and benefit from basic wireless service.

The BVA greatly appreciates the efforts of the Commission to make wireless, and other technologies, accessible to the blind, including our membership of blinded veterans.

Sincerely,

Thomas Zampieri
Director Government Relations

CHARTERED BY THE CONGRESS OF THE UNITED STATES



American Council of the Blind

2200 Wilson Blvd., Suite 650 • Arlington, VA 22201 • Tel: (202) 467-5081 • Fax: (703) 465-5085

December 6, 2012

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir or Madam:

The American Council of the Blind (ACB) is a leading national membership organization whose purpose is to work toward independence, security, equality of opportunity, and improved quality of life for all blind and visually impaired people. Founded in 1961, ACB's members work through more than 70 state and special-interest affiliates to improve the well-being of all blind and visually impaired people by: serving as a representative national organization; elevating the social, economic and cultural levels of blind people; improving educational and rehabilitation facilities and opportunities; cooperating with the public and private institutions and organizations concerned with blind services; encouraging and assisting all people with severely impaired vision to develop their abilities, and; conducting a public education program to promote greater understanding of blindness and the capabilities of people who are blind.

ACB supports the petition of Odin Wireless to be designated an eligible telecommunications carrier.

Many blind and visually impaired people do not take advantage of mobile technology because the service is either not accessible or affordable to them. The blind community experiences lower average incomes and higher unemployment rates than the general population. The Lifeline program can play an important role in increasing the number of blind and visually impaired people that benefit from mobile technology.

Currently, wireless eligible telecommunications carriers do not satisfy the needs of the blind community. Odin Wireless provides promise that this will change.

The American Council of the Blind commends the Commission on its efforts to make mobile technology more accessible.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eric Bridges", is written over a light-colored background.

Eric Bridges
Director of Advocacy and Governmental Affairs